## CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006 EB-06-TC-060 EB Docket No. 06-36

Company Name(s): See Attached List

Address: 521 E. Morehead Street Suite 250 Charlotte, NC 28202

I am a corporate officer of the referenced company(ies). I hereby certify that I have personal knowledge that the Company/Companies has established operating procedures that are adequate to ensure compliance with the FCC's rules concerning customer proprietary network information (CPNI), as contained in 47 C.F.R. §§ 64.2001 et seq.

Attached to this Certificate is a Statement describing how the procedures used by the Company/Companies ensure compliance with the CPNI rules.

I hereby certify that the information contained in this Certificate and the attached Statement are accurate and complete to the best of my ability.

Name (signature):

Name (printed): Peter G. Nixon

Title: Chief Operating Officer

Date: February 3, 2006

## STATEMENT CONCERNING CPNI PROCEDURES

1. To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without customer approval, the Company employs the following procedures.

In general, our companies currently do not segment or target our customer base by using proprietary information to sell services. We instead frequently use marketing strategies that do not segment based on certain customer information, usually in the form of bill inserts, global direct mail to all customers, and media that reach the general public. However, we do sometimes market services to our customers using CPNI in situations that do not require customer approval. For example, we market calling features to current local customers.

2. To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Company employs the following procedures.

Additionally, several of our companies request opt-out and opt-in consent, in accordance with the CPNI rules. Those companies sometimes use that consent as appropriate to market services to customers where allowed. For example, if the company is planning to market long distance service to its customer base, they would pull information that would let them know: (a) who was a current local customer who did not have long distance service from them; and (b) has not indicated that they do not want us to contact them about such service. If the customer has indicated that they opt-out, then the customer would not be placed on the marketing list. We provide all required notices on an annual basis.

3. To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Company employs the following procedures.

As described above, CPNI is used only in limited instances, and then only by companies that have systems in place for clearly establishing a customer's CPNI approval. We provide periodic training sessions to our personnel to ensure they are aware of when they are and are not authorized to use CPNI. We have an express disciplinary process in place to handle any instances where improper use is made of CPNI. For those instances where we do use CPNI for marketing purposes, we maintain records of those marketing campaigns with the details and retention periods required by the CPNI rules. We have a supervisory review process regarding compliance with the CPNI rules; we retain records of compliance as required by the rules, and sales personnel obtain supervisory approval of proposed requests for opt-in or opt-out approvals.

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## Company Name(s):

Bentleyville Communications Corporation

Berkshire Telephone Corporation

Big Sandy Telecom, Inc.

Bluestem Telephone Company

Chautauqua and Erie Telephone Corporation

China Telephone Company

Fremont Telcom Co.

GTC, Inc. d/b/a/ GT Com

Maine Telephone Company

Marianna and Scenery Hill Telephone

Company

Northland Telephone Company of Maine, Inc.

Odin Telephone Exchange, Inc.

The Orwell Telephone Company

Chouteau Telephone Company

Columbine Telecom Company

The Columbus Grove Telephone Company

Community Service Telephone Co.

C-R Telephone Company

The El Paso Telephone Company

Ellensburg Telephone Company

Peoples Mutual Telephone Company

Sidney Telephone Company

Standish Telephone Company

STE/NE Acquisition Corp., d/b/a/ Northland

Telephone Co. of Vermont

Sunflower Telephone Company, Inc.

Taconic Telephone Corp.

Yates City Telephone Company

YCOM Networks, Inc.

ST Long Distance, Inc.

Marianna Tel, Inc.

Quality One Technologies, Inc.

C-R Long Distance, Inc.

Taconic Technology Corp.

Elltel Long Distance Corp.

Peoples Mutual Long Distance Company

Commtel Communications Inc.

El Paso Long Distance Company

FairPoint Carrier Services, Inc.